

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA)	
v.)	NO. 3:21-cr-00158
[1] BRANDON MILLER)	18 U.S.C. § 371
[2] JARIUS BRUNSON)	18 U.S.C. § 922(a)(1)(A)
[3] DEMARCUS ADAMS)	18 U.S.C. § 922(a)(3)
[4] BLAISE SMITH)	18 U.S.C. § 922(a)(5)
[5] RAHEEM JOHNSON)	18 U.S.C. § 922(a)(6)
[6] BRYANT LARKIN)	18 U.S.C. § 923(a)
[7] COREY CURTIS)	18 U.S.C. § 924
[8] ELIJAH TILLMAN)	18 U.S.C. § 924(o)
[9] TERRELL MITCHELL)	18 U.S.C. § 1956(h)
[10] LAZARUS GREENWOOD)	
[11] DWIGHT LOWRY)	
[12] DRESHION PARKS)	

MOTION FOR DETENTION HEARING AND DETENTION

The United States of America, by and through Mark H. Wildasin, United States Attorney, and Joshua A. Kurtzman and Kathryn Risinger, Assistant United States Attorneys for the Middle District of Tennessee, requests a hearing pursuant to 18 U.S.C. § 3142(f)(1)(A), which mandates a hearing upon motion of the United States in a case that involves a firearm and a crime of violence.

In this case, every defendant was charged on March 28, 2022, with one count of conspiracy under Title 18, United States Code, Section 371 related to weapons trafficking and receipt of

weapons transported in interstate commerce; one count of participating in a money laundering conspiracy in violation of Title 18, United States Code, Section 1956(h); and conspiracy to possess firearms in furtherance of drug trafficking crimes and use and carry firearms during and in relation to crimes of violence, in violation of 18 U.S.C. § 922(o). Pursuant to 18 U.S.C. § 3156(a)(4)(C), the term “crime of violence,” as used in 18 U.S.C. § 3142(f)(1)(A), includes any “offense that has as an element of the offense the use, attempted use, or threatened use of physical force against the person or property of another; [or] any other offense that is a felony and that, by its nature, involves a substantial risk that physical force against the person or property of another may be used in the course of committing the offense.” Therefore, the United States is entitled to a detention hearing in this case.

The United States further moves that the Court detain the defendant unless he is able to overcome the rebuttable presumption, pursuant to 18 U.S.C. § 3142(e)(3)(B), that no conditions, or combination of conditions, will reasonably assure the defendants presence in court or the safety of the community.

With respect to this case, there is no doubt that Bryant Larkin, Corey Curtis, Terrell Mitchell, Lazarus Greenwood, Dwight Lowry, and Dreshion Parks, who are currently in custody, and Elijah Tillman, Blaise Smith, and Raheem Johnson, who are currently at large, should be detained pending trial. As outlined below, each of these Defendants sought to obtain and obtained firearms so they could participate in an incredibly violent gang war that plagued certain neighborhoods in Chicago for over a year. As outlined in the Superseding Indictment, from September 2019 until their arrest on April 28, 2021, Brandon Miller, Jarius Brunson, and DeMarcus Adams, all enlisted soldiers stationed at Fort Campbell, Kentucky, purchased almost 100 firearms in Clarksville, Tennessee, and Hopkinsville, Kentucky to provide to Gangster

Disciples in Chicago to whom Miller was connected through his childhood and family. At least seven of the firearms purchased by the Defendants were recovered in various violent incidents in Chicago (homicides, shootings, and a mass shooting) or connected to violent incidents via National Integrated Ballistic Information Network (“NIBIN”) forensic analysis. Moreover, a search warrant conducted at the home shared by Miller and Adams led to the recovery of multiple firearms and approximately 49 gun boxes, some of which are directly tied to firearms recovered in Chicago by serial number.

Continued investigation identified Blaise Smith, Raheem Johnson, Bryant Larkin, Corey Curtis, Elijah Tillman, Terrell Mitchell, Lazarus Greenwood, Dwight Lowry, and Dreshion Parks (hereinafter referred to as the “Chicago-based Defendants”) as individuals ordering, paying for, and receiving the firearms in Chicago. Each of these defendants is a member of the Pocket Town Gangster Disciples and has the following characteristics in common: (1) they communicated regularly with Miller regarding firearms purchases, orders, payment, and delivery; (2) they have a phone number identified through multiple means, such as they provided the number to law enforcement; they registered for a payment service (Zelle, CashApp, etc.) with this number and identified themselves in that account by name, address, and social security number; and/or (3) they are clearly identifying themselves in text message exchanges with Miller, thus confirming their identity. Likewise, the two deceased individuals named in the Superseding Indictment, Dontae Thomas, the cousin of defendant Bryant Larkin, and Khalief Whitfield both died while either armed with or surrounded by firearms purchased by Miller and his crew.

Through meetings with the Chicago Police Department intelligence lead for the Pocket Town area of Chicago, where Miller and all of our Chicago-based Defendants hail from, we have learned that from June 2020 through July 2021, the Pocket Town Gangster Disciples, as part of a

gang alliance known as Kill to survive or KTS, had a gang war with a rival group known as “No Limit,” which is a faction of the Black P. Stones. This war involved numerous shootings, targeted murders, and targeted murder attempts between the two groups. Some examples of the shootings involved in this gang war include:

- September 27, 2020 – K.F. (Pocket Town Gangster Disciple), the suspected half-brother of Brandon Miller, was killed in a shooting.
- February 7, 2021 – C.J. (Pocket Town Gangster Disciple) was shot and injured and the vehicle used by the shooters was associated with No Limit;
- February 24, 2021 – A.P, also known as “Lil Art”, who was considered to be a high ranking member of Kill To Survive was shot multiple times and the suspects in the shooting were associated with No Limit;
- February 28, 2021 – G.J. was murdered just after noon in a barber shop in the South Loop of Chicago¹ and the suspect in the homicide was arrested by Chicago Police the day after the shooting in possession of a firearm trafficked in the conspiracy. Of note, G.J. aka “Lil Greg” was considered a high-ranking member of the No Limit gang and a close friend of Herbert Wright III aka “G Herbo”²;
- March 26, 2021 – at a memorial for a Pocket Town Gangster Disciple who had died recently, No Limit members shot seven individuals and murdered Dante Thomas aka

¹ See <https://www.chicagotribune.com/news/criminal-justice/ct-g-herbo-friend-murder-gun-charge-20210203-m6suroinj5g7linofsd4ftaq4-story.html> for the details of this shooting and the arrest of C.M. with a firearm trafficked in the conspiracy.

² G Herbo is a popular rap music artist in the city of Chicago and, according to media outlets, closely associated with “No Limit,” a faction of the Black P. Stones. See <https://wgntv.com/news/inside-a-deadly-south-side-gang-conflict-that-feds-say-was-fueled-by-us-soldiers/>.

“Spook,” a known Pocket Town Gangster Disciple. From this shooting scene, law enforcement recovered five firearms that were trafficked from the Middle District of Tennessee to Chicago;

- On May 10, 2021, B.J., a known member of the Pocket Town Gangster Disciples was shot; and
- On July 10, 2021, L.S. aka “KTS Dre,” a known member of Kill To Survive who was considered a high-ranking member of the organization, was shot 64 times and killed as he was leaving Cook County Jail.³

This gang war and the associated acts form a large part of the 18 U.S.C. § 924(o) conspiracy outlined in greater detail below. Moreover, this gang war is the sole reason the Chicago-based Defendants sought out firearms, obtained firearms, and engaged in violence.

There are countless communications between Miller and the Chicago-based Defendants in which the Chicago-based Defendants order firearms, coordinate payment for firearms, discuss the gang war that led them to arm themselves, and coordinate delivery of the firearms to Chicago. The Superseding Indictment articulates just a portion of the communications between the Chicago-based Defendants and Miller. It is not an exaggeration to say there are thousands of pages of messages between the Chicago-based Defendants and Miller regarding weapons trafficking. Moreover, evidence gathered from the dozens of subpoenas to CashApp, Zelle, USAA, and other financial institutions also inculpates the overwhelming majority of Chicago-based Defendants. Additionally, all of these individuals are known members of the Pocket Town Gangster Disciples.

³ See <https://www.usnews.com/news/best-states/illinois/articles/2021-07-12/man-ambushed-outside-cook-county-jail-shot-64-times>.

These communications outline that the firearms trafficked by Miller to the Chicago-based Defendants were needed to assist the Pocket Town Gangster Disciples in a gang war.

There are multiple allegations in the Superseding Indictment regarding the violent events and drug trafficking events associated with the firearms trafficked from the Middle District of Tennessee to Chicago. The following firearm recoveries, described by the associated 922(a)(6) charges in the Superseding Indictment demonstrate the dangerousness of the Chicago-based Defendants:

- Count Seven of the Superseding Indictment alleges that a Glock 23 .40 caliber pistol, with serial number AEKW006, purchased by MILLER on January 4, 2021, was recovered as part of a homicide investigation in Chicago.
 - On February 2, 2021, C.M., a three-time convicted felon, was arrested in Chicago by the Chicago Police Department (CPD) and charged with Armed Habitual Criminal. The arrest stemmed from C.M. being a suspect in a homicide of “Lil Greg” that occurred in Chicago on January 28, 2021. During C.M.’s arrest, one Glock 23, .40 caliber firearm bearing serial number AEKW006 was recovered from the satchel that was around C.M.’s shoulders. C.M. is a confirmed member of the Pocket Town Gangster Disciples.
- Count Nine of the Superseding Indictment alleges that a Glock 21 Gen4 .40 caliber pistol, with Serial Number AERW236, purchased by Miller on January 20, 2021, was recovered from another shooting in Chicago, where an individual was wounded, on March 11, 2021.
 - On March 11, 2021, a Glock 21Gen4, .45 caliber firearm bearing serial number AERW263 was recovered from the residence of K.G. The recovery stemmed from the shooting incident involving K.G. that occurred outside his residence. According

to law enforcement databases, K.G. is a member of the Pocket Town Gangster Disciples. The time from purchase to recovery of the firearm is 50 days. From the police report, it appears that K.G. was the target of a drive-by shooting by No Limit and used the firearm provided to him by Miller to shoot back at his No Limit assailants.

- Count Twelve of the Superseding Indictment alleges that a Glock 17 Gen5 9mm pistol bearing serial number BPKP034, which was purchased by Brunson on January 22, 2021 from the Fort Campbell Main Exchange, was recovered during a traffic stop and foot pursuit by the Bridgeview (Illinois) Police Department. The firearm was recovered from a stolen vehicle that was occupied by two previously convicted felons. Officers received a report that individuals were selling drugs from the vehicle behind an apartment building. The driver of the vehicle was taken into custody without incident, but the passenger of the vehicle fled from the police on-foot and with a stolen bicycle before he was eventually taken into custody. A search of the vehicle revealed drugs and drug paraphernalia, including 100 grams of marijuana split into multiple bags, plastic baggies, a digital scale with marijuana residue, multiple cigars containing marijuana, and two firearms (one from our conspiracy and another one). The firearm connected to our case had an extended magazine with 28 rounds of ammunition. Both of the previously convicted felons are confirmed members of the Pocket Town Gangster Disciples.
- Count Fourteen of the Superseding Indictment alleges that a Smith & Wesson SD40VE .45 caliber pistol with serial number FDA5336 recovered from a juvenile and used in a shooting just 15 days after it was purchased by Miller from a Federal Firearms Licensee on February 12, 2021.

- On February 27, 2021, two black males engaged in an argument at the Marathon gas station located at 1839 E. 95th St. in Chicago, Illinois. The argument escalated into both shooting at each other, then fleeing the area. The shooters were not apprehended but spent cartridge cases were recovered from the scene. One of the individuals fled the scene in a vehicle captured on camera. The shell casings from this shooting were positively compared to a Smith & Wesson SD40VE .45 caliber pistol with serial number FDA5336, which is a firearm trafficked in the conspiracy.
- On May 1, 2021, a victim reported to CPD that a black male, later identified as 17-year-old E.L., pointed a firearm at her. E.L. was positively identified by the victim, and he was subsequently arrested for aggravated assault with a deadly weapon. During the arrest, one Smith & Wesson model SD440VE bearing serial number FDA5336 was recovered from E.L.'s bag that was trafficked as part of the conspiracy.
- Count Fifteen of the Superseding Indictment alleges that a Glock 45 9mm pistol, Serial Number BSBC884, purchased by Miller recovered from a homicide in June 2021.
 - Per a Harvey City (Illinois) Police Department incident report, on June 23, 2021, Khalief Whitfield and T.H. were travelling in a 2004 black four door Lexus bearing Illinois license plate number CL 77093, and pulled up to D.H. in the parking lot of a gas station in Harvey, Illinois. Whitfield fired several shots at D.H. from inside of the vehicle and D.H. returned fire and Whitfield later succumbed to his injuries. D.H. is believed to be part of a gang that is rivals with the Pocket Town Gangster Disciples.

- Count Sixteen and Eighteen of the Superseding Indictment alleges that a recovered firearm led to a broader investigation in the Quad Cities area of Illinois/Iowa, which eventually led to a state search warrant of a residence used by Terrell Mitchell.
- Count Seventeen of the Superseding Indictment alleges that a Glock 19 9mm pistol bearing serial number BSCB342 was purchased by Brunson on March 5, 2021 from a Federal Firearms Licensee in Clarksville, Tennessee that was recovered during a foot pursuit with an unknown suspect and the firearm had been modified with a Glock switch to make the weapon fully automatic.
 - Miller's communications with the Chicago-based Defendants indicate strongly that Miller was also supplying members of the Pocket Town Gangster Disciples with Glock switches.
- Count Nineteen of the Superseding Indictment alleges that a Smith & Wesson M&P .45 caliber pistol, Serial Number HTL1203, was recovered from a shooting where the offenders used the firearm, a ShotSpotter alert went out, and officers recovered the firearm at the scene.
 - Results of a search warrants of Miller's phone shows him in possession of this weapon on March 13, 2021.
- Count Twenty and Twenty-One of the Superseding Indictment alleges that a Glock 17 9mm pistol, Serial Number AFKD437, purchased by Miller from a Federal Firearms Licensee was recovered from a vehicle with ecstasy and digital scales in it at a concert in Moline, Illinois, which was connected to Terrell Mitchell, a known Pocket Town Gangster Disciple, who has admitted that he received firearms from Miller.

- There are also multiple text conversations between Dwight Lowry and Miller where they discuss drug trafficking, payment for drugs, and the simultaneous possession or need for firearms while drug trafficking.
- On or about June 23, 2021, Chicago Police Department officers conducted a traffic stop on a vehicle where Dreshion Parks was sitting in the front passenger seat and officers smelled marijuana emanating from the vehicle. A search revealed that Parks possessed almost ten grams of marijuana and a Springfield Armory XD MOD2 .40 caliber pistol bearing serial number BY465572 that was previously purchased by Brunson from a Federal Firearms Licensee in Kentucky and subsequently transported to Chicago by Miller.

For all of the reasons outlined above, the United States avers that the Chicago-based Defendants should all be detained.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing will be served on defense counsel at or before the time of the initial appearance in this case.

On this, the 1st day of April, 2022.

/s/ Joshua A. Kurtzman
Joshua A. Kurtzman